

EXHIBIT 19

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July 2, 2025

VIA EMAIL ONLY

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**Re: In the Matter of COEYMAN'S MARINE TOWING, LLC D/B/A CARVER
MARINE TOWING AS Owner and Operator of M/T Mackenzie Rose Case
No. 2:24-cv-00490 (United States District Court, Eastern District of Virginia)**

Counsel:

We write in response to the Belt Line's recent letters dated June 23 and June 30, 2025.
Please find Carver's responses to both letters below.

June 23, 2025 Letter – Daily Logs

In your June 23, 2025, letter, the Belt Line states in paragraphs two and three that Carver's recent log production is incomplete and concludes in paragraph four that Carver is in breach of the Court's Order (Doc. 50). We categorically reject this characterization. Carver has substantially complied with this Court's Order. Carver performed due diligence, operated in good faith, and conducted a comprehensive search for all responsive documents. Your repeated assertions to the contrary are both incorrect and unfounded. All materials within Carver's possession, custody, or control that are responsive to your requests and not otherwise protected by privilege have been produced. Please see the Affidavit of Josef Malik for further details.

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Furthermore, the newly produced Daily Logs that you claim are incomplete were provided directly by TBS. Between the initially produced Daily Logs (CARVER 25-32) and the recently produced Daily Logs, the Belt Line has received all the Daily Logs from January 1 to September 15, 2024, despite any record variances in Carver's productions. Notwithstanding, after receiving your letter, we sought clarification from TBS and learned of a TBS oversight that occurred during the processing of the records, which caused two versions of the same logs to be retrieved.

Carver will provide revised Daily Logs in its forthcoming Sixth Supplemental Response to the Belt Line's First Requests for Production, which merge both versions into single comprehensive logs.

June 30, 2025 Letter – Carver's Productions

Please find Carver's responses to tables enclosed in your June 30, 2025 letter regarding Carver's productions.

Carver's Responses to the 1st RFPs

Request No.	Information Sought	Missing Information
4	Course, position, and speed of the M/T MACKENZIE ROSE.	Original Rose Point Server Data was not produced. CARVER 907 contains a limited screen recording with no audio

Carver's Response: Carver has reviewed its records and determined that it does not have Rose Point data describing the course, position, and speed of the vessel from June 10 through June 20, 2024, because Rose Point data is available to Carver for only 30 days. Notwithstanding, we are resending the Rose Point files that Carver initially produced to the Belt Line during discovery. The Rose Point files were sent and saved in CEVDR format.

Request No.	Information Sought	Missing Information
16	Log books of the M/T MACKENZIE ROSE for January 1, 2024 through September 15, 2024	Missing rough logs from July 25-September 15, 2024. Rough logs were produced only from January 1-July 24, 2024. Also missing Master's Daily Vessel Reports from January 1-June 10, 2024 and June 21-September 15, 2024

Carver's Response: Carver has reviewed its records and has determined that it is not in possession of rough logs from July 25-September 15, 2024. The Master's Daily Vessel Reports from January 1-June 10, 2024 and June 21-September 15, 2024 have been requested from TBS and will be produced upon receipt from TBS.

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Request No.	Information Sought	Missing Information
17	Reports of displacement, drafts, trim, or list of M/T MACKENZIE ROSE for June 10 - 20, 2024.	Missing Reports of Displacement from June 10, 11, 17- 20, 2024

Carver's Response: Carver has reviewed its records and has determined that it is not in possession of additional documents responsive to this request because this information would be found in Rose Point, which is available to Carver for only 30 days.

Request No.	Information Sought	Missing Information
34	Communications post-allision between the crew members and any government entity	Missing crew communications from June 15- July 1, 2024

Carver's Response: Carver has produced all communications responsive to this request. See CARVER 706-795 served March 4, 2025, Carver emails in PST format in Carver's Third Supplemental Response to NPBL's 1st Requests for Production served May 23, 2025, and Carver's Amended Third Supplemental Production, served May 28, 2025, CARVER ESI 000001-1867. If the Belt Line believes there is a particular crew email communication that is missing, please advise.

Regarding Jason Galioto's email referring to a "master file" compiled and produced for the United States Coast Guard. This master file was created internally with counsel in response to an official USCG investigation. Thus, it is protected under the work product privilege. The underlying documents requested have been previously produced in this litigation as CARVER 000001-252.

Carver's Responses to the 2nd RFPs

Request No.	Information Sought	Missing Information
3	Documents relating to James Morrissey's training from Carver from January 1, 2020 to present.	Missing training information from March 2024 through June 2024

Carver's Response: See CARVER 851-861, produced in Carver's First Supplemental Response to the Belt Line's Second Set of Requests for Production on April 16, 2025.

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Request No.	Information Sought	Missing Information
4	Documents relating to the disciplinary history of James Morrissey	Missing information from before the allision

Carver's Response: Carver has reviewed its records and has determined that it is not in possession of additional documents responsive to this request, as no documents exist relating to the disciplinary history of James Morrissey before the allision.

Request No.	Information Sought	Missing Information
11	Documents evidencing training relating to the steering, navigation, and autopilot system on the M/T MACKENZIE ROSE from January 1, 2020 to present	CARVER 911-941 were identified in Carver's June 10, 2025 letter but not produced to the Belt Line on April 25, 2025

Carver's Response: We are reproducing CARVER 911-941 CARVER, which were produced in Carver's Responses to Evanston's First set of Requests for Production on April 25, 2025. See also CARVER TBS HELM CONNECT 1079-1136, CARVER TBS HELM CONNECT 1137-1201, CARVER TBS HELM CONNECT 1208-1301, CARVER TBS HELM CONNECT 1310-1386, CARVER TBS HELM CONNECT 1436-1556, CARVER TBS HELM CONNECT 1589-1618.

Documents Identified in Depositions

Relevant RFP	Information Sought	Missing Information
1 st RFP No. 30 & 34	Communications to/from Mr. Baldassare's work cell phone on June 15-20, 2024, including texts, emails, photographs, videos and phone call logs	Missing any information from Mr. Baldassare's work cell. Carver has been promising the Belt Line this cell data for months

Carver's Response: Documents (texts messages) responsive to this request were recently received from KL discovery, a third-party vendor, and will be produced in Carver's forthcoming Sixth Supplemental Response to the Belt Line's First Requests for Production.

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Relevant RFP	Information Sought	Missing Information
1st RFP No. 30 & 34	Communications to/from Mr. Moore's work cell phone on June 15-20, 2024, including texts, emails, photographs, videos and phone call logs	Missing any information from Mr. Moore's Cell

Carver's Response: Carver is not in possession of documents responsive to this request because Mr. Moore was not issued a work cell phone.

Relevant RFP	Information Sought	Missing Information
1st RFP No. 30 & 34	Communications between Mr. Moore and Mr. Baldassare relating to CG-2692 form, including drafts, texts, emails, photographs, videos and phone call logs	Missing other communications not included in emails

Carver's Response: Carver has produced all email communications responsive to this request. The emails were initially provided in PST format in Carver's Third Supplemental Response to NPBL's First Set of Requests for Production and were served May 23, 2025. The emails were formally produced in Carver's Amended Third Supplemental Production, served May 28, 2025, CARVER ESI 000001-1867. If the Belt Line believes there is a particular email communication that is missing, please advise.

Answers to Second Set of Interrogatories and Third Set of Requests for Production

As testified by Nick Laraway at his deposition, Carver is searching for documents relating to the freight or towage for the services provided for at the time of the allision, and documents relating to the lease or charter of the barge. We will amend our responses to reflect the results of said search.

Very truly yours,



James H. Rodgers